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August 12, 2022

**Via ECF**

The Honorable Roanne L. Mann  
United States Magistrate Judge  
United States District Court  
for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Joint Status Report: *Suffolk County Water Authority v. The Dow Chemical Co. et al.*,  
No. 2:17-cv-6980-NG-RLM

Dear Judge Mann:

On behalf of Plaintiff Suffolk County Water Authority (“SCWA”) and Defendants The Dow Chemical Company, Vulcan Materials Company, and Ferro Corporation, the Parties update below their progress regarding additional discovery items sought in response to the Court’s July 1, 2022 order on Defendants’ motion to compel production of SCWA’s SCADA database (Dkt. No. 316, “Order”).

SCWA sent a copy of its SCADA data to Defendants on a hard drive. Defendants’ consultant has been unable to access the data as produced. SCWA and Defendants are conferring about a potentially workable process for read-only access to SCWA’s SCADA system; the production of certain SCADA data in the format Defendants have requested; and streamlining the production of the remaining information based on Defendants’ review of the soon-to-be produced SCWA *InfoWater* hydraulic model and Piping & Instrumentation Diagram (P&ID) files. The parties will report to the Court on the status of those discussions by August 19.

\* \* \*

The Parties will promptly bring to the Court any issues requiring earlier intervention following further good faith conferral.

Respectfully submitted,

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